

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

FILED  
01/10/2025 03:56 PM  
in the Clerk's Office  
U.S. District Court,  
EDNY, Brooklyn  
Pro Se Office via  
Box.com

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SARAH EDMONDSON, *et al.*

Plaintiffs,

v.

Keith Raniere, *et al.*

Defendants.

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1:20 - cv - 00485-EK-CLP

**DEFENDANT DANIELLE ROBERTS' MOTION FOR EXTENSION OF TIME  
PURSUANT TO F.R.C.P. 6(b)**

1. Defendant hereby requests an extension of time to file their opposition to the motion to dismiss counterclaims and counter-motion to amend counterclaims.
2. As the court is aware, I just submitted "DEFENDANT DANIELLE ROBERTS' REPLY IN SUPPORT OF HER MOTION TO DISMISS COUNT V: BATTERY AND MOTION FOR JUDICIAL NOTICE PURUSANT TO 201(c)(2)."
3. As part of that pleading, I submitted for the court to take Judicial notice of a Newsweek article that just recently came out on or about December 24, 2024, and I discovered a few days after the holidays.
4. As part of that article, the referenced experts who I had not consulted with, nor obtained or reviewed their information were cited. This is the first time I have seen an outside expert review Raneire's experts findings, and they have agreed with Raniere's experts.

5. Based on the article alone, it appears that a lot of their work will be supporting my counterclaims, and will not only further bolster them, but likely will result in additional claims as well, once their research is fully reviewed.
6. Further, there was an Expert Report submitted on the docket for the criminal matter, that was referenced in the article that I had not previously reviewed.
7. I acknowledge and appreciate The Court's grace in granting me an extension for the motion I submitted today, despite my struggle to locate the proper rules, nor properly requesting it. Because of the above events, I am asking for an additional 21 days to submit this pending motion and 1) oppose the dismissal of counterclaims and 2) submit a counter-motion to amend the counterclaims based on this additional information.
8. I am reviewing and preparing substantial new evidence and case law in this matter, and want to make sure to present all of the current issues to the court, so as to avoid multiple submissions and using additional time and resources of The Court and all those involved.
9. I do not foresee that the additional 21 days will bias any party, and it will permit me to submit a complete response with amended counterclaims, which to date, I have not been able to finalize considering the additional information.
10. As such, I'm asking for this extension to incorporate these into my response.
11. Additionally, The Court's decision on my recently submitted reply in support of my motion to dismiss the last count against me may influence the counter claims I submit and the evidence supporting them.
12. I appreciate the court's continued understanding in this matter.

As such, Plaintiff requests that an extension of time be granted for the response until January 31, 2025.

Dated: This 10<sup>th</sup> Day of January, 2025

Defendant *Pro Se*  
Respectfully submitted,

/s/ Danielle Roberts

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**ORDER**

It is hereby ordered by the court, that Defendant shall have until January 31 , 2025 to submit a response to the Motion to Dismiss and a motion to amend counter-claims, if any at that time as well. All responses to those documents are also extended by 21 days from their current date.